

1      **GEORGE K. CHEBAT (034232)**

2      George@EnaraLaw.com

3      **JOSEPH J. TOBONI (031385)**

4      Joseph@EnaraLaw.com

5      **DANIEL DE JULIO (035854)**

6      Danny@Enaralaw.com

7      **Enara Law PLLC**

8      7631 East Greenway Road, Suite B-2

9      Scottsdale, Arizona 85260

10     Telephone: (602) 687-2010

11     *Attorneys for Plaintiff*

12                   **UNITED STATES DISTRICT COURT**

13                   **DISTRICT OF ARIZONA**

14     Valentino Dimitrov, individually, and on  
15     behalf of all others similarly situated;

16     Case No.: 2:23-CV-00226-DJH

17     Plaintiffs,

18     vs.

19     Stavatti Aerospace, Ltd, a Minnesota  
20     corporation; Stavatti Aerospace, Ltd, a  
21     Wyoming corporation; Stavatti Corporation,  
22     a Minnesota corporation; Stavatti Immobiliare,  
23     Ltd, a Wyoming corporation; Stavatti  
24     Industries, Ltd, a Wyoming corporation;  
25     Stavatti Niagara, Ltd, a New York  
26     corporation; Stavatti Super Fulcrum, Ltd,  
27     a Wyoming corporation; Stavatti Ukraine, a  
28     Ukrainian business entity; Stavatti Heavy  
29     Industries Ltd, a Hawaii corporation;  
30     Christopher Beskar and Maja Beskar, husband  
31     and wife; Brian Colvin and Corrina Colvin,  
32     husband and wife; John Simon and Jean  
33     Simon, husband and wife; William  
34     McEwen and Patricia McEwen, husband  
35     and wife; Rudy Chacon and Jane Doe  
36     Chacon, husband and wife; and DOES 1  
37     through 10, inclusive,

38                   **PLAINTIFF'S APPLICATION FOR**  
39                   **ENTRY OF DEFAULT AGAINST**  
40                   **DEFENDANTS STAVATTI**  
41                   **AEROSPACE LTD, A WYOMING**  
42                   **CORPORATION; STAVATTI**  
43                   **IMMOBILIARE, LTD, A WYOMING**  
44                   **CORPORATION; STAVATTI**  
45                   **INDUSTRIES, LTD, A WYOMING**  
46                   **CORPORATION; STAVATTI SUPER**  
47                   **FULCRUM LTD, A WYOMING**  
48                   **CORPORATION; AND STAVATTI**  
49                   **HEAVY INDUSTRIES LTD, A HAWAII**  
50                   **CORPORATION**

51     Defendants.

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default  
2 against Defendants: Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti  
3 Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming  
4 corporation; Stavatti Super Fulcrum, LTD, a Wyoming corporation; and Stavatti Heavy  
5 Industries Ltd, a Hawaii corporation (collectively, “Defendants”) pursuant to Fed. R. Civ.  
6 P. 55(a).

7 In support of this request, Plaintiff relies on the record in this case and the affidavit  
8 submitted as “**Exhibit A**”.

10 **RESPECTFULLY SUBMITTED** this 3rd day of April, 2023.

12 **ENARA LAW, PLLC**

13 By: /s/ George K. Chebat  
14 George K. Chebat  
15 Joseph J. Toboni  
16 Daniel de Julio  
17 *Attorneys for Plaintiff*

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on the 3rd day of April, 2023, a copy of the foregoing was  
3 transmitted electronically to the CM/ECF filing system for filing and transmittal along  
4 with copies transmitted to all counsel of record via the CM/ECF system.

5  
6  
7  
8 By: /s/ Shelly N. Witgen, ACP